

Richard M. Pachulski, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard, 13th Floor
Los Angeles, California 90067-4100
Telephone: (310) 277-6910
Telecopy: (310) 201-0760

Lynn L. Tavenner, Esq. (VA Bar No. 30083)
Paula S. Beran, Esq. (VA Bar No. 34679)
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178

Counsel to Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:) Case No. 08-35653 (KRH)
)
CIRCUIT CITY STORES, INC., <u>et al.</u> , ¹) Chapter 11
)
Debtors.) (Jointly Administered)
)

NOTICE OF MOTION AND HEARING THEREON

PLEASE TAKE NOTICE that the Circuit City Stores, Inc. Liquidating Trust (the “Trust”), through its Trustee, Alfred H. Siegel, has filed the **MOTION OF THE LIQUIDATING TRUSTEE FOR ENTRY OF AN ORDER FURTHER EXTENDING TERM OF LIQUIDATING TRUST** (the “Motion”)[Docket No. 14334], with the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Court”), a copy of which is simultaneously being served upon you.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in these bankruptcy cases. (If you do not have an attorney, you may wish to consult one). Under the Case Management Order (as defined hereafter) and Local Bankruptcy Rule 9013-1, unless a written response to the Motion is filed with the Clerk of Court and served on the moving party within seven (7) days before the scheduled hearing date, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order(s) granting the relief requested.

PLEASE TAKE FURTHER NOTICE that in connection with the Debtors’ Chapter 11 Cases, a Supplemental Order Establishing Certain Notice, Case Management and Administrative

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identifications numbers, are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapasco Designs, Inc. (6796), Sky Venture Corp. (0311), Prahls, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512).

Procedures [Docket No. 6208] (the “**Case Management Order**”) was entered by the Court on December 30, 2009, which, among other things, prescribes the manner in which objections must be filed and served and when hearings will be conducted. A copy of the Case Management Order may be obtained for a fee via PACER at <http://www.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that on **January 18, 2023 at 1:00 PM** (or such time thereafter as the matter may be heard)(the “**Hearing**”) the undersigned will appear before The Honorable Kevin R. Huennekens and will move the Court for entry of an order(s) approving the Motion.

In accordance with Richmond General Order 22-2, the Hearing shall be conducted both in-person and by Zoom for Government. Persons wishing to appear may participate by either, at their option, appearing in person at Judge Huennekens’ Courtroom, 701 E. Broad St., Courtroom 5000, Richmond, Virginia, or registering in advance at

<https://www.zoomgov.com/meeting/register/vJlscuqtrzvGFfOxcvK4FseAfd9d5Q4fsg>

PLEASE NOTE: You MUST submit the Zoom registration no later than two (2) business days prior to this hearing.

If you do not want the Court to grant the relief, or if you want the Court to consider your views, then within seven (7) days before the hearing date you or your attorney must:

- ☒ File with the Court, at the address shown below, a written response with supporting memorandum pursuant to Local Bankruptcy Rule 9013-1 and the Case Management Order. You must mail or otherwise file it early enough so the Court will **receive** it on or before the due date identified herein.

Clerk of the Court
United States Bankruptcy Court
701 E. Broad Street, Suite 4000
Richmond, VA 23219

You must also serve a copy on the undersigned.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Dated: December 28, 2022

/s/ Lynn L. Tavenner
Lynn L. Tavenner, Esq. (VA Bar No. 30083)
Paula S. Beran, Esq. (VA Bar No. 34679)
TAVENNER & BERAN, PLC
20 North Eighth Street, 2nd Floor
Richmond, Virginia 23219
Telephone: (804) 783-8300
Telecopy: (804) 783-0178
Email: ltavenner@tb-lawfirm.com
pberan@tb-lawfirm.com

and

Richard M. Pachulski, Esq.
Andrew W. Caine, Esq.
(admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Boulevard, 13th Floor
Los Angeles, California 90067-4100
Telephone: (310) 277-6910
Telecopy: (310) 201-0760
E-mail:rpachulski@pszjlaw.com
acaine@pszjlaw.com

*Counsel for the Circuit City Stores, Inc.
Liquidating Trust*

CERTIFICATE OF SERVICE

I certify that on or before the 28th day of December 2022, a true copy of the foregoing will be served via electronic delivery and/or first class mail, postage prepaid, to the parties receiving ECF notification in these Cases, to the Office of the United States Trustee, and to the Core and 2002 List maintained in these Cases.

/s/ Lynn L. Tavenner

Counsel